REMARKS

Claims 1-30 were originally pending in the Application. In a Preliminary Amendment and Response to Restriction Requirement earlier filed on June 12, 2003, Applicants elected with traverse to pursue prosecution of claims within the Group II identified by the Examiner.

The Office Action mailed on July 8, 2003 maintains the restriction requirement thereby rendering claims falling within the non-elected Groups withdrawn with traverse. The Office Action further rejects claims 9-24 and 26-28, and allows claims 29 and 30.

This Response is filed in response to the Office Action mailed on July 8, 2003. The Applicants thank the Examiner for acknowledging that claims 29 and 30 are patentable. The Applicants understand that, although the Examiner originally deemed Group II to include claims 9-24 and 26-30, after entry of the Preliminary Amendment, Group II includes claims 9-24 and 29-30, but not claims 26-28. Accordingly, although claims 26-28 have been rejected, the Applicants do not respond to the rejection of claims 26-28 because those claims are considered withdrawn with traverse.

Claims 1-8 and 25-28 stand withdrawn with traverse; claims 9-24 stand rejected; and claims 29-30 are allowed.

Rejections Under 35 U.S.C. §103

Claims 9-15, 17-23, and 26 were rejected under 35 U.S.C. §103 as being unpatentably obvious over U.S. Patent No. 5,991,763 to Long et al. (hereinafter "Long").

Rejection of Claim 9 in View of Long

Claim 9 is directed to a method for mapping a first file object identifier having a first bite size to a second file object identifier having a second bite size and recites:

(a) receiving said first file object identifier associated with a file object;
(b) transforming said first file object identifier into said second file object identifier based on at least one file system characteristic; and

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(c) providing said second file object identifier to facilitate access to said file object.

The Office Action suggests, with respect to claim 9, that Long discloses steps (a) and (c) of claim 9, and that it would have been obvious to one [of] ordinary skill in the art "to modify the teachings of Long with transforming said first file object identifier into said second file object identifier based on at least one file system characteristic" in order "to provide additional data storage capacity."

Long teaches "software, methods, and apparatus for creating virtual file systems . . . without converting the data into source code or higher-level language data structures." Col. 3, lines 44-49. According to Long, "creating a virtual file system in memory that is associated with the computers serves the purpose of allowing efficient access to the virtual file system. Col. 4, lines 14-19 (emphasis added). "[V]irtual file systems are generally created to eliminate the need to constantly access physical file systems during the course of executing a kernel or other computer program." Col. 4, lines 32-35. Thus, "a virtual file system . . . enables a program to access the virtual file system as if the virtual file system were a local file system." Col. 4, lines 35-38 (emphasis added). In summary, Long teaches method and apparatus for creating a version of a file system that that can be readily accesses instead of the original file system.

Long does not teach or suggest receiving a first file object identifier associated with a file object and providing a second file object identifier to facilitate access to the file object. Claim 9, in contrast, recites receiving a first file object identifier associated with a file object and providing a second file object identifier to facilitate access to the file object. Thus, the Applicants respectfully submit that, since Long does not teach or suggest at least step (c) of claim 9, claim 9 is patentable in view of Long. Further, the Applicants submit that claims 10-16, which depend on claim 9 and include all of the limitations therein, are also patentable in view of Long.

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Rejection of Claim 17 in View of Long

Claim 17 is directed to an article of manufacture having computer-readable program means embodied therein for mapping a first file object identifier having a first bite size to a second file object identifier having a second bite size and recites:

> (a) computer-readable program means for receiving said first file object identifier associated with a file object;
> (b) computer-readable program means for transforming said first file object identifier into said second file object identifier based on at least one file system characteristic; and
> (c) computer-readable programs means for providing said second file object identifier to facilitate access to said file object.

The Office Action suggests that claim 17 is obvious in view of Long for the reasons stated above with respect to claim 9.

As discussed above with respect to claim 9, Long does not teach or suggest receiving a first file object identifier associated with a file object and providing a second file object identifier to facilitate access to the file object. Claim 17, in contrast, recites computer-readable program means for receiving a first file object identifier associated with a file object and computer-readable program means for providing a second file object identifier to facilitate <u>access to the file object</u>. Thus, the Applicants respectfully submit that, since Long does not teach or suggest at least element (c) of claim 17, claim 17 is patentable in view of Long. Further, the Applicants submit that claims 18-24, which depend on claim 17 and include all of the limitations therein, are also patentable in view of Long.

Schmuck Does Cure the Deficiencies in Long

Claims 16, 24, 27-28, and 30 were rejected under 35 U.S.C. §103 as being unpatentably obvious over Long in view of U.S. Patent No. 5,991,763 to Schmuck et al. (hereinafter "Schmuck"). In particular, the Office Action suggests that Long discloses the claimed subject matter except the "second file object identifier is a POSIX file," Schmuck discloses "the

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proposed POSIX access control list standard," and that it would have been obvious "to modify the teachings of Long and Schmuck with a POSIX file."

Schmuck generally teaches a shared disk file system where a file system instance on each machine has identical access to all of the disks coupled to and forming a part in the file system. Col. 3, lines 26-29. Schmuck's invention "operates as a parallel file system in a shared disk environment." Col. 3, lines 39-40. "[E]xtended file attributes support access control lists, known as ACL's." Col. 3, lines 47-48. "[T]okens are used for metadata node selection and identification, and [there are] enhanced token modes for controlling file size, as well as smart caching of byte range tokens using file access patterns and a byte range lock algorithm using a byte range token interface." Col. 4, lines 12-17.

The Office Action specifically cites a paragraph in Schmuck that teaches how attributes of a newly created file are set. Schmuck states that the "POSIX ACL standard specifies that when a new file or directory is created, its ACL is set to a default ACL value associated with the directory in which the file is created." Col. 27, lines 60-64. "In other words, under POSIX ACLs a new file inherits its ACL from its parent directory." Col. 27, lines 64-65.

Schmuck does not teach or suggest receiving a first file object identifier associated with a file object and providing a second file object identifier to facilitate access to the file object. Similarly, as discussed above with respect to claim 9, Long does not teach or suggest receiving a first file object identifier associated with a file object and providing a second file object identifier to facilitate access to the file object. Thus, the Applicants respectfully submit that since Long and Schmuck, alone and in combination, do not teach or suggest at least step (c) of claim 9 and element (c) of claim 17, claims 9 and 17 are patentable in view of Long and Schmuck. Further, the Applicants submit that claims 10-16 and 18-24, which depend on claims 9 and 17 respectively and include all of the limitations therein, are also patentable in view of Long and Schmuck.

Therefore, in light of the foregoing reasons, Applicants respectfully request that the rejections under 35 U.S.C. §103 be reconsidered and withdrawn.

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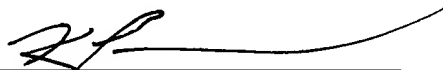Page 8 of 9

SUMMARY

Claims 1-8 and 25-28 stand withdrawn with traverse; claims 9-24 stand rejected; and claims 29-30 are allowed. Applicants request that the Examiner reconsider the application and claims in light of the foregoing Response, and respectfully submit that the pending claims are in condition for allowance.

If, in the Examiner's opinion, a telephonic interview would expedite the favorable prosecution of the present application, the undersigned attorney would welcome the opportunity to discuss any outstanding issues, and to work with the Examiner toward placing the application in condition for allowance.

Applicants believe that no additional fees are necessitated by the present Amendment. However, in the event that any additional fees are due, the Commissioner is hereby authorized to charge any such fees to Attorney's Deposit Account No. 20-0531.

Respectfully submitted,

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